

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	)	
	)	Case No. 22-60020
INFOW, LLC, <i>et al.</i> ,	)	
	)	Chapter 11 (Subchapter V)
Debtors. <sup>1</sup>	)	
	)	Jointly Administered

**FIRST AND FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES OF PARKINS & RUBIO LLP, AS GENERAL  
COUNSEL FOR THE DEBTORS, FOR THE PERIOD  
APRIL 18, 2022 THROUGH MAY 15, 2022**

Name of applicant		Parkins & Rubio LLP
Applicant's professional role in case		General bankruptcy counsel to InfoW, LLC (f/k/a InfoWars LLC), IWHealth, LLC (f/k/a InfoWars Health, LLC), and Prison Planet TV, LLC
Indicate whether this is an application for pre or post confirmation services		Pre-confirmation
	Beginning of Period	Ending of Period
Total period covered in application:	04/18/2022	5/15/2022
Time periods covered by prior applications:	N/A	N/A
Total amounts awarded in all prior Applications:		\$0
Amount of prepetition retainer received in the case:		\$175,000.00
Amount of prepetition retainer remaining in the case:		\$8,097.57

<sup>1</sup> The Debtors in these chapter 11 cases along with the last four digits of each Debtor's federal tax identification number are as follows: InfoW, LLC, f/k/a Infowars, LLC (6916), IWHealth, LLC f/k/a Infowars Health, LLC (no EIN), Prison Planet TV, LLC (0005). The address for service to the Debtors is PO Box 1819, Houston, TX 77251-1819.

Total fees applied for in this application and in all prior applications (including any retainer amounts applied or to be applied):	\$162,677.50
Total fees applied for in this application (including any retainer amounts to be applied):	\$162,677.50
Total professional fees requested in this application:	\$131,842.50
Total actual professional hours covered by this application:	196.7
Average hourly rate for professionals:	\$670.27
Total actual paraprofessional fees requested in this application:	\$30,835.00
Total paraprofessional hours covered by this application:	126.7
Average hourly rate for paraprofessionals:	\$243.37
Reimbursable expenses sought in this application:	\$67.50
Amount of attorney fees provided for in plan.	\$0 (N/A)
Total distribution to Unsecured Creditors under the plan:	\$0 (N/A)
Expected % dividend to Unsecured Creditors under the plan:	0% (N/A)
Expected amount to be paid to all pre-petition creditors:	\$0 (N/A)
Date of any scheduled dismissal hearing:	June 10, 2022
Date of confirmation hearing:	(N/A)
Indicate whether plan has been confirmed:	No

### **INDEX OF EXHIBITS**

- Exhibit A Parkins & Rubio LLP Timekeepers and Billing Rates
- Exhibit B Summary of Time Expended by Timekeepers
- Exhibit C Time Records and Expense Details

TO THE HONORABLE DAVID LOPEZ,  
UNITED STATES BANKRUPTCY JUDGE:

Parkins & Rubio LLP (“P&R”), f/k/a Parkins Lee & Rubio LLP, general bankruptcy counsel to InfoW, LLC (f/k/a InfoWars LLC), IWHealth, LLC (f/k/a InfoWars Health, LLC) and Prison Planet TV, LLC (collectively, the “Debtors”), hereby submits its First and Final Application for Allowance of Compensation and Reimbursement of Expenses (this “Application”), pursuant to §§ 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”, rules 2014, 2016, and 6003 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rule 2016-1 of the Bankruptcy Local Rules of Southern District of Texas (the “Local Rules”), seeking entry of an order granting final allowance of compensation and reimbursement of expenses incurred during the period of April 18, 2022 through and including May 31, 2022 (the “Application Period”) as further explained herein. In support of the Application, P&R respectfully will show the following:

### **JURISDICTION**

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
2. Venue of the Debtor’s Chapter 11 Case in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory base of the relief sought are §§ 327(a) and 330 of the Bankruptcy Code, Bankruptcy Rules 2014, 2016, and 6003, and Local Rule 2016-1.

### **BACKGROUND**

#### **A. The Debtors**

4. On April 18, 2022 (the “Petition Date”), each of the Debtors commenced a bankruptcy case (collectively, the “Chapter 11 Cases”) by filing a petition for relief under chapter

11, subchapter v, of title 11 of the United States Code, 11 U.S.C. §§ 101 – 1532 (as amended, the “Bankruptcy Code”).

5. On May 13, 2022, the Debtors filed the *Debtors’ Application to Employ Parkins Lee & Rubio LLP as Bankruptcy Counsel for the Period From April 18 to May 15, 2022* (the “Retention Application”) [ECF No. 94].

6. As discussed in the Retention Application, Kyung Lee withdrew from Parkins Lee & Rubio LLP effective as of May 15, 2022, and the firm changed its name to Parkins & Rubio LLP.

7. On June 9, 2022, the Court entered the *Stipulation and Agreed Order Dismissing Debtors’ Chapter 11 Cases* [ECF No. 114].

8. P&R’s Retention Application remains pending. The 21-day objection period has expired.

9. This is P&R’s first and final request for allowance and payment of fees and reimbursement of expenses.

### **RELIEF REQUESTED**

10. Pursuant to sections 330 and 331 of the Bankruptcy Code, P&R respectfully requests allowance of professional fees in the amount of \$162,677.50, reimbursement of expenses in the amount of \$67.50, for a total request of \$162,745.00 for the Application Period.

11. P&R has made every effort to ensure that the Application is in compliance with the Local Rules and the United States Trustee Appendix A – Guidelines for Reviewing Applications for Compensation of Expenses filed Under 11 U.S.C. § 330, dated January 30, 1996 (the “U.S. Trustee Guidelines”).

12. P&R has made every effort to avoid unnecessary duplication of effort by and among its attorneys and paralegals.

13. No agreement exists between P&R and any other person, firm or entity for the division or sharing of compensation in this case.

**PROCEDURAL POSTURE FOLLOWING DISMISSAL**

14. Notwithstanding the entry of the order dismissing the Debtors' Chapter 11 Cases, the Court retains authority to approve professional fees in connection with the cases. *In re Lowe*, 97 B.R. 547, 548-49 (Bankr. W.D. Mo. 1987) ("The Court has the inescapable duty to determine the reasonableness of attorney's fees awards . . . This duty must be performed even after dismissal of the case."); *In re Fox*, 140 B.R. 761, 762 (Bankr. D. S.D. 1992) (holding that "counsel may only obtain or retain compensation upon court approval of fee applications," and holding that a bankruptcy court has jurisdiction to determine attorney fees even after the case's dismissal).

15. "A Court may retain only that jurisdiction which it possesses in the first instance." *In re 5900 Associates, LLC*, 326 B.R. 402, 410 (E.D. Mich. 2005). The Court's jurisdiction to review attorney fees following dismissal of an underlying bankruptcy is without regard to whether such jurisdiction was expressly retained by the Court in its dismissal order. *In re Quaker Distribs., Inc.*, 189 B.R. 63, at 68 ("[T]here is no reason to conclude that dismissal of a case could or should eliminate bankruptcy court review of a debtor's transactions with its professionals."; holding that the bankruptcy court's expressly-stated intention to review fee applications in its dismissal order simply constitutes the law of the case, not a prerequisite to jurisdiction); *See Fox*, 140 B.R. at 764 (holding that, even if the order dismissing the bankruptcy case did not expressly retain jurisdiction over matters regarding attorney fees, the court nevertheless had jurisdiction over such fees).

16. P&R's recourse for payment of professional fees is limited to approval by this Court. *See Lowe*, 97 B.R. at 409 (even after dismissal, professional fees under 11 U.S.C. § 330 are not a matter for private agreement); *see also, In re Inslaw, Inc.*, 106 B.R. 331, 333–34 (Bankr. D. D.C. 1989) (holding that a debtor's agreement to pay a different fee is irrelevant and does not affect the bankruptcy court's authority to determine an attorney's compensation under § 330).

**NATURE AND EXTENT OF SERVICES PROVIDED BY P&R**

17. P&R's attorneys are experienced in all aspects of bankruptcy matters, possess a high level of expertise, and have an excellent reputation in the business and legal communities. The professional biographies of P&R's current attorneys are available on the PR website at [www.parkinsrubio.com](http://www.parkinsrubio.com).

18. P&R sought to minimize the expenditure of time by its senior attorneys by delegating responsibilities to junior attorneys and paralegals, as appropriate.

19. P&R has maintained detailed written records of the time expended by attorneys and paraprofessionals in rendering professional services to the Debtors. These time records were generated contemporaneously with the performance of the professional services described therein and in the ordinary course of P&R's practice. The rates charged are the same rates that P&R regularly charges its hourly clients.

20. A summary of the P&R timekeepers and their billing rates in the Chapter 11 Case is attached hereto as **Exhibit A**.

21. Attached hereto as **Exhibit B** is a summary of fees by professional and paraprofessional incurred during the Application Period.

22. The specific tasks undertaken by P&R, the number of hours devoted, and the amounts charged by each attorney and paralegal and the expense details are set forth in the invoices

attached hereto as **Exhibit C**. The time records are set forth in chronological order by project category.

**STANDARD FOR APPROVING COMPENSATION**

23. Section 330 of the Bankruptcy Code authorizes the Court to award P&R reasonable compensation for its actual and necessary services rendered as well as reimbursement of its actual and necessary expenses incurred in the rendering of services as general counsel to the Debtor.

Section 330 provides:

- (a)(1) After notice to the parties in interest and to the United States Trustee and a hearing, and subject to sections 326, 328, and 329, the court may award to a trustee, a consumer privacy ombudsman appointed under section 332, an examiner, an ombudsman appointed under section 333, or a professional person employed under section 327 or 1103:
  - (A) reasonable compensation for actual, necessary services rendered by the trustee, examiner, ombudsman, professional person or attorney and by any paraprofessional person employed by any such person; and
  - (B) reimbursement for actual, necessary expenses.

11 U.S.C. § 330(a)(1).

24. Section 331 of the Bankruptcy Code authorizes the Court to award compensation on a final basis as follows:

A trustee, an examiner, a debtor's attorney, or any professional person employed under section 327 or 1103 of this title may apply to the court not more than once every 120 days after an order for relief in a case under this title, or more often if the court permits, for such compensation for services rendered before the date of such an application or reimbursement of expenses incurred before such date as is provided under section 330 of this title. After notice and a hearing, the court may allow and disburse to such applicant such compensation or reimbursement.

11 U.S.C. § 331.



25. This Application substantiates the total amount that P&R seeks for fees and expenditures in accordance with each element of the customary standards applied to fee applications. These standards are set forth in (i) Rule 2016 of the Bankruptcy Rules, and (ii) *In re First Colonial Corp. of America*, 544 F.2d 12 (5<sup>th</sup> Cir. 1977), *cert denied*, 431 U.S. 904 (1977).

26. In *First Colonial*, the Fifth Circuit adopted twelve factors to apply to the determination of awards of attorneys' fees in bankruptcy cases: (i) time and labor required; (ii) the novelty and difficulty of the questions; (iii) the skill requisite to perform the legal service properly; (iv) the preclusion of other employment by the professional due to acceptance of the case; (v) the customary fee; (vi) whether the fee is contingent or fixed; (vii) time limitations imposed by the client or the circumstances; (viii) the amount involved and the results obtained; (ix) the experience, reputation and ability of the attorneys; (x) the "undesirability" of the case; (xi) the nature and length of the professional relationship with the client; and (xii) awards in similar cases. *First Colonial*, 544 F.2d at 1298-99. These factors were taken from *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717-19 (5<sup>th</sup> Cir. 1974), a non-bankruptcy case, and are commonly referred to as the "*Johnson factors*." The original *Johnson factors*, as embraced by *First Colonial*, remain applicable to the determination of reasonableness of fees awarded under the Bankruptcy Code. 15 King, *Collier on Bankruptcy*, ¶ 330.04[3] at 330-35 to 330-41. A majority of the *Johnson factors* are now codified under Bankruptcy Code Section 330(a). *Id.* The following analysis of the *First Colonial* factors support the reasonableness of PR's requested fees and expenses:

- a. Time and labor required. The professional services rendered by P&R on behalf of the Debtors have required expenditure of time and effort, as set out in detail on Exhibit B and Exhibit C.
- b. Novelty and Difficulty of Legal Problems Involved. This *Johnson* factor examines the degree of novelty and difficulty of the issues encountered by P&R in representing the Debtors. P&R faced a number of difficult and

complex legal issues in these Chapter 11 Cases including issues related to pending state court litigation and the issues raised in the motions to dismiss.

- c. The skill requisite to perform the legal services properly. A number of difficult issues and matters addressed in this case required a high degree of skill and expertise. P&R's attorneys have been used effectively and efficiently to perform the tasks assigned to them and have provided valuable and effective assistance to the Debtors. Addressing these issues required knowledge and application of the Bankruptcy Code, the Bankruptcy Rules, and court decisions interpreting the same.
- d. Preclusion of other employment due to the acceptance of this case. This representation required a substantial devotion of time, but it did not preclude attorneys at P&R from devoting time to other cases.
- e. Customary Fee. P&R's hourly billing rates, as set out in Exhibit A, are the rates that P&R regularly charges its hourly clients. The hourly rates charged by P&R are similar to or lower than or commensurate with the customary fees charged by professionals of similar experience, reputation, and abilities in this community, as well as those rates charged regionally and nationally. Additionally, the hourly rates charged by P&R are consistent with the amounts involved in this case, the results obtained by P&R, and the level of skill necessary to perform the work. Accordingly, the fees charged by P&R are reasonable and customary. P&R has coordinated with the Debtors' other professionals to avoid duplication of services and to minimize fees and expenses to the bankruptcy estates.
- f. Whether the fee is fixed or contingent. P&R charges customary hourly rates, as adjusted annually, for the time expended by its attorneys and paralegals in representing the Debtors. P&R's fee is not outcome dependent.
- g. Time limitations imposed by the client or the circumstances. All services rendered by P&R were necessary, proper, and beneficial to the bankruptcy cases and the bankruptcy estates. Services were provided in some cases under time pressures that required the performance of services late into the evening over weekends and holidays. Services performed by P&R throughout this case were done in a professional, skilled, and expeditious manner, requiring substantially less time than would have been required by counsel with less experience. Every action of P&R was taken to reduce the legal hours expended and matters not demanding the services of senior attorneys were assigned to junior attorneys, associates, or paralegals.
- h. The amount of time involved and the results obtained. P&R's actions in this case have allowed the Debtors to meet the challenges facing them in connection with their Chapter 11 Cases. Notably, the filing of these Chapter 11 Cases led to the dismissal of the litigation against the Debtors – the

litigation that necessitated the filing of the Debtors' Chapter 11 Cases. The requested compensation is reasonable in view of the time expended and the results obtained in the case.

- i. The experience, reputation, and ability of the professionals. P&R's attorneys, over many years, have appeared throughout the United States providing legal representation to trustees, debtors, secured creditors, unsecured creditors, and committees. Further, partners of P&R have for many years actively participated in leadership positions in local, state and national bar associations, and have written for local and national publications and spoken at local, state, and national institutes for continuing legal education in the creditors' rights and bankruptcy areas. P&R's attorneys are experienced in all aspects of bankruptcy matters, possess a high level of expertise, and have an excellent reputation in the business and legal communities. Furthermore, P&R has particular experience in the areas of complex insolvency, workout, and corporate reorganization.
- j. The undesirability of the case. The chapter 11 case was highly contentious and likely was undesirable to other law firms. Moreover, it required a significant commitment of time from P&R's attorneys and paralegals.
- k. Nature and length of professional relationship with the client. P&R commenced its relationship with the Debtors on March 23, 2022 and provided pre-petition services to the Debtor to prepare for the bankruptcy filing. While not a particularly lengthy relationship, by providing these pre-petition services, P&R developed knowledge about the Debtors that has been useful in the representation of the Debtors in these Chapter 11 Cases.
- l. Awards in similar cases. The compensation requested in this case is comparable to, if not less than, the compensation allowed in other cases similar in size and complexity to this case.

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**CONCLUSION**

WHEREFORE, PR respectfully requests approval and allowance of a total award for the Application Period in the amount of \$162,745.00, comprised of (i) compensation for professional services in the amount of \$162,677.50; (ii) reimbursement of expenses in the amount of \$67.50, and approval of any and all other relief to which PR may be entitled.

Dated: June 14, 2022

Respectfully Submitted

PARKINS & RUBIO LLP

/s/ Charles M. Rubio  
Lenard M. Parkins PLLC  
TX Bar No. 15518200  
Charles M. Rubio P.C.  
TX Bar No. 24083768  
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crubio@parkinsrubio.com  
hneilson@parkinsrubio.com

*Counsel to the Debtors*

**CERTIFICATE OF SERVICE**

I certify on June 14, 2022, I caused a true and correct copy of the foregoing document to be served by (1) the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas to all parties registered to receive CM/ECF notice and (2) via First Class Mail, postage pre-paid, on the parties listed in the attached service list.

/s/ Charles M. Rubio  
Charles M. Rubio

**EXHIBIT A**

<b>ATTORNEY/ PARAPROFESSIONAL</b>	<b>ROLE</b>	<b>BILLING RATE</b>
Kyung S. Lee	Partner	\$850.00
R.J. Shannon	Associate	\$625.00
Hale Neilson	Associate	\$525.00
Adam Rodriguez	Paralegal	\$250.00
Britnie McFadden	Paralegal	\$180.00

**EXHIBIT B**

<b>ATTORNEY/ PARAPROFESSIONAL</b>	<b>ROLE</b>	<b>DATE OF ADMISSION</b>	<b>BILLING RATE</b>	<b>HOURS BILLED</b>	<b>TOTAL FEES</b>
Kyung S. Lee (KSL)	Partner	1984 (Tex.)	\$850.00	43.5	\$36,975.00
R.J. Shannon (RJS)	Associate	2014 (Md)	\$312.50	2.6	\$812.50
R.J. Shannon (RJS)	Associate	2014 (Md)	\$625.00	149.9	\$93,687.50
Hale Neilson (HN)	Associate	2019 (Tex.)	\$525.00	0.7	\$367.50
Adam Rodriguez (AR)	Paralegal	N/A	\$250.00	116.5	\$29,125.00
Britnie McFadden (BM)	Paralegal	N/A	\$180.00	9.5	\$1,710.00
<b>TOTAL</b>				<b>322.7</b>	<b>\$162,677.50</b>

**EXHIBIT C**

Time Records and Expense Details



## Summary of Invoices

**Parkins & Rubio LLP**  
700 Milam Street, Suite 1300  
Houston, Texas 77002  
United States  
[www.parkinsrubio.com](http://www.parkinsrubio.com)

InfoWars, LLC

Project Category	Invoice	Amount
Asset Analysis and Recovery	Invoice #530	\$2,250.00
Case Administration	Invoice #531	\$20,212.50
Claims Administration and Objections	Invoice #532	\$5,191.00
Corporate Governance and Board Matters	Invoice #533	\$8,275.00
Employment and Fee Applications	Invoice #534	\$7,081.50
Litigation	Invoice #535	\$116,680.00
Plan and Disclosure Statement	Invoice #536	\$2,175.00
Non-Working Travel	Invoice #568	\$812.50
<b>Total Fees</b>		<b>\$162,677.50</b>

Project Category	Invoice	Amount
Expenses	Invoice #567	\$67.50
<b>Total Expenses</b>		<b>\$67.50</b>

Total Fees	\$162,677.50
Total Expenses	\$67.50
<b>Fee Payment Requested Plus Expense Reimbursement</b>	<b>\$162,745.00</b>



## Payment Instructions

### Check Payment Information

**Remit checks to:** Parkins & Rubio LLP  
700 Milam Street, Suite 1300  
Houston, Texas 77002

### Wire Transfer and Online Payment Information

**Bank Name/Address:** JPMorgan Chase Bank, N.A.  
dba Chase Bank  
8 East Pkwy, Scarsdale, NY 10583

**Bank ABA/Routing #:** ABA Number 021000021 (For international transfers: CHASUS33)

**Name/Account #:** Parkins & Rubio LLP  
Operating Account  
Account Number 761958377



**Parkins & Rubio** LLP

Attorneys and Counselors at Law

**Parkins & Rubio LLP**

700 Milam Street, Suite 1300

Houston, Texas 77002

www.parkinsrubio.com

# INVOICE

PLR Internal Reference # 530

Date: 06/06/2022

InfoWars, LLC

**Asset Analysis and Recovery**

Date	Attorney	Description	Quantity	Rate	Total
05/13/2022	RJS	Gather and organize documentation of Debtors' business and operations for M. Schwartz and K. Lee (.8); analyze Youngevity payments and basis therefore (2.5); draft email outlining same to M. Schwartz and K. Lee (.3).	3.60	\$625.00	\$2,250.00

**Quantity Subtotal 3.6**

Time Keeper	Quantity	Rate	Total
R. J. Shannon	3.6	\$625.00	\$2,250.00

**Quantity Total 3.6**

**Subtotal \$2,250.00**

**Total \$2,250.00**



**Parkins & Rubio** LLP

Attorneys and Counselors at Law

**Parkins & Rubio LLP**

700 Milam Street, Suite 1300  
Houston, Texas 77002  
www.parkinsrubio.com

# INVOICE

PLR Internal Reference # 531

Date: 06/06/2022

InfoWars, LLC

**Case Administration**

Date	Attorney	Description	Quantity	Rate	Total
04/18/2022	AR	Preparation and filing of Verification of Creditor Matrix, Declaration of 20 Largest Unsecured Creditors, Corporate Ownership Statement, Motion for Joint Administration, Emergency Motion to Appoint Trustees, and Emergency Motion to Employ CRO in the three debtor cases	2.20	\$250.00	\$550.00
04/18/2022	RJS	Call with UST staff (.3); call with proposed trustees Schmidt and Nelms and staff (.5); call with S. Jordan for AEJ and R. Battaglia for FSS (.5); prepare notice for first day filings and send same (.3); draft notice of first day hearings and send same to A. Rodriguez (.4).	2.00	\$625.00	\$1,250.00
04/18/2022	AR	Preparation and filing Notice of Removal in Pozner et al v Jones et al, 22-01021-jqj WD Bankr. Tex, Heslin et al v Jones et al, 22-06004-mmp WD Bankr. Tex, Fontaine v Jones, 22-01022-jqj WD Bankr. Tex., Heslin, et al v Jones, 22-01023-jqj WD Bankr. Tex., Lewis v Jones, et al, 22-01024-jqj WD Bankr. Tex. cases	2.40	\$250.00	\$600.00
04/18/2022	AR	Preparation and service documents filed by debtors to parties listed in service list	4.40	\$250.00	\$1,100.00
04/18/2022	AR	Zoom call with co-counsel and proposed Trustees regarding filings and commencement of case.	1.00	\$250.00	\$250.00
04/18/2022	AR	Zoom meeting with co-counsel regarding First Day hearing	0.50	\$250.00	\$125.00

04/19/2022	AR	Draft and revise Notice of Hearing for First Day Hearing on April 22, 2022.	0.40	\$250.00	\$100.00
04/19/2022	AR	Electronic and hard copy service of Notice of Hearing of First Day Hearing on April 22, 2022.	2.50	\$250.00	\$625.00
04/19/2022	AR	Attend Zoom conference with co-counsel regarding first day pleadings and upcoming First Day Hearing.	1.00	\$250.00	\$250.00
04/19/2022	AR	Draft Notice of Agenda for First Day Hearing on April 22, 2022.	0.90	\$250.00	\$225.00
04/19/2022	AR	Draft Witness and Exhibit List for First Day Hearing on April 22, 2022.	0.90	\$250.00	\$225.00
04/19/2022	AR	Review Initial Debtor Interview letter from US Trustee and calendar deadlines regarding same.	0.40	\$250.00	\$100.00
04/19/2022	AR	Review comments made to Debtors' Complaint for Declaratory and Injunctive Relief.	2.70	\$250.00	\$675.00
04/20/2022	KSL	Handle calls and emails requesting information on Infowar cases and handle all issues relating to filing (2.0).	2.00	\$850.00	\$1,700.00
04/21/2022	RJS	Attention to W&E list from A. Rodriguez re emergency hearings and email R. Schmidt and R. Nelms re CVs (.1); revise W&E list and email final copy to A. Rodriguez (.6); draft form service email for A. Rodriguez to send after filing (.1).	0.80	\$625.00	\$500.00
04/21/2022	AR	Attend Zoom conference with K Lee, R. Shannon, M Schwartz regarding recent updates with US Trustee and to discuss First Day Hearing	0.40	\$250.00	\$100.00
04/21/2022	AR	Draft and update master service list and contact info sheet.	1.00	\$250.00	\$250.00
04/22/2022	AR	Attention to emails; review and update Master Service List and Certificate of Service recipients.	1.30	\$250.00	\$325.00
04/25/2022	KSL	Handle issues on how to handle fees and funds for same and discuss with M. Schwartz (.5).	1.50	\$850.00	\$1,275.00
04/26/2022	RJS	Review and revise Bar Date Motion (1.8); draft email to K. Lee and A. Rodriguez re comments and revisions to same (.1).	2.00	\$625.00	\$1,250.00
04/28/2022	AR	Attend Zoom meeting regarding potential public relations firm.	0.60	\$250.00	\$150.00

04/28/2022	KSL	Assist M. Schwartz with PR aspects of the Chapter 11 Cases (.4); handle update of new developments in cases with proposed Trustees (.3); analyze new issues to be handled as Chapter 11 Cases develop after hearings on Motions to Dismiss (.3).	1.00	\$850.00	\$850.00
04/29/2022	AR	Draft Agenda for Status Conference to be held on April 29, 2022.	0.50	\$250.00	\$125.00
04/29/2022	AR	Review comments and revise Draft Agenda for Status Conference to be held on April 29, 2022	0.80	\$250.00	\$200.00
04/29/2022	AR	File and serve Agenda for Status Conference to be held on April 29, 2022.	0.30	\$250.00	\$75.00
04/29/2022	AR	Attend Status Conference held on April 29, 2022.	1.30	\$250.00	\$325.00
04/29/2022	AR	Perform search of Austin Shiprock Publishing on the Texas Secretary of State website to determine managing members and current status	0.30	\$250.00	\$75.00
04/29/2022	AR	Review, file and serve Notice of Amended and Restated Declaration of Trust and Plan Support Agreement	0.30	\$250.00	\$75.00
04/29/2022	AR	Review and revise Debtors' Motion for Entry of an Order Compelling Mediation of Plan and Confirmation Related Disputes.	2.80	\$250.00	\$700.00
04/29/2022	AR	Retrieve recently filed documents in the the chapter 11 and removal cases and upload into firm litigation database; code and tag same.	1.70	\$250.00	\$425.00
05/02/2022	RJS	Mark up H. Lee draft schedules and email H. Lee re same (1.8); call with K. Lee, M. Schwartz, and H. Lee re same (.5); draft motion to extend time re SOFA (.9); file and serve schedules and motion to extend time (.8).	4.00	\$625.00	\$2,500.00
05/03/2022	AR	Service of Motion to Extend Time to File Statement of Financial Affairs	1.00	\$250.00	\$250.00
05/03/2022	KSL	Review issues relating to Schedules (.5).	0.50	\$850.00	\$425.00
05/04/2022	RJS	Draft email to H. Lee re SOFA and litigation to be included.	0.30	\$625.00	\$187.50
05/04/2022	RJS	Call with K. Lee, M. Schwartz, S. Jordan, and A. Rodriguez re postreorg payments for license of IP>	0.70	\$625.00	\$437.50
05/05/2022	RJS	Attention to H. Lee emails re IDI & SOFA and respond to same .	0.10	\$625.00	\$62.50

05/06/2022	RJS	Respond to M. Schwartz email re certificate of formation for InfoW and IWHealth (.2).	0.20	\$625.00	\$125.00
05/08/2022	RJS	Call with M. Schwartz; K. Lee; R. Battaglia; and M. Ridulfo re transition of matter.	0.70	\$625.00	\$437.50
05/11/2022	RJS	Respond to K. Lee email re IDI Report.	0.10	\$625.00	\$62.50
05/18/2022	RJS	Emails to H. Lee re IDI report (.1); attention to, follow up research regarding letter from Randaza firm re Fontaine (.3); forward same to K. Lee and M. Schwartz (.1).	0.50	\$625.00	\$312.50
05/19/2022	RJS	Draft emails to A. Moshenberg re motion to strike removed TUFTA lawsuit.	1.50	\$625.00	\$937.50
<b>Quantity Subtotal</b>					<b>49.5</b>

<b>Time Keeper</b>	<b>Quantity</b>	<b>Rate</b>	<b>Total</b>
Kyung Lee	5.0	\$850.00	\$4,250.00
R. J. Shannon	12.9	\$625.00	\$8,062.50
Adam Rodriguez	31.6	\$250.00	\$7,900.00
<b>Quantity Total</b>			<b>49.5</b>
<b>Subtotal</b>			<b>\$20,212.50</b>
<b>Total</b>			<b>\$20,212.50</b>



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# INVOICE

PLR Internal Reference # 532

Date: 06/06/2022

InfoWars, LLC

**Claims Administration and Objections**

Date	Attorney	Description	Quantity	Rate	Total
04/26/2022	AR	Prepare initial draft of bar date motion and estimation motion	3.90	\$250.00	\$975.00
04/26/2022	KSL	Edit and revise Bar Date Motion and Order (1.0); revise and edit Motion to Estimate Claims (1.0).	2.00	\$850.00	\$1,700.00
04/27/2022	AR	Draft shell of Motion to Estimate Claims and Request for Protective Order.	5.70	\$250.00	\$1,425.00
04/27/2022	BM	Prepare and send mass mailing regarding Debtors' Motion for Entry of an Order (I) Setting Bar Dates for Filing Proofs of Claims, etc.	1.20	\$180.00	\$216.00
04/28/2022	AR	Review and revise claim estimation motion.	2.50	\$250.00	\$625.00
05/11/2022	RJS	Respond to K. Lee email re remaining claims after dismissal of Plaintiffs' claims (.4).	0.40	\$625.00	\$250.00
<b>Quantity Subtotal</b>					<b>15.7</b>

Time Keeper	Quantity	Rate	Total
Kyung Lee	2.0	\$850.00	\$1,700.00
R. J. Shannon	0.4	\$625.00	\$250.00

Britnie McFadden	1.2	\$180.00	\$216.00
Adam Rodriguez	12.1	\$250.00	\$3,025.00
<b>Quantity Total</b>			<b>15.7</b>
<b>Subtotal</b>			<b>\$5,191.00</b>
<b>Total</b>			<b>\$5,191.00</b>





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# INVOICE

PLR Internal Reference # 533  
Date: 06/06/2022

InfoWars, LLC

## Corporate Governance and Board Matters

Date	Attorney	Description	Quantity	Rate	Total
04/23/2022	KSL	Extended conference call with Marc Schwartz, R. Shannon, Shelby Jordan and R. Battaglia to discuss issues relating to PSA and Trust Agreement and requirements of same to proceed with Plan (1.0)	1.00	\$850.00	\$850.00
04/27/2022	AR	Attend Zoom meeting with PLR team regarding comments to PSA and LST.	1.20	\$250.00	\$300.00
04/27/2022	RJS	Review revisions to Declaration of Trust and PSA (.3); attend call with M. Schwartz and counsel for proposed trustees, AEJ and FSS re same (.6); draft email re Debtors' proposed revisions (.3).	1.20	\$625.00	\$750.00
04/28/2022	RJS	Finalize revisions to Litigation Settlement Trust and PSA negotiated among proposed trustees, third-party funding contributors, and Debtors.	4.50	\$625.00	\$2,812.50
04/29/2022	RJS	Various emails regarding revised proposed LST declaration and PSA with UST (.5); obtain appropriate documents to prepare redline of same (.5); draft notice of revised documents and direct filing of same (.4); office conference with K. Lee, M. Schwartz, R. Battaglia, and S. Jordan in advance of hearing (2.0); prepare for and attend status hearing (1.5); office conference with same after hearing (.3).	5.20	\$625.00	\$3,250.00

04/30/2022	RJS	Draft emails to R. Battaglia and S. Jordan re execution of PSA and LST declaration (.2); attention and respond to follow up email from K. Lee re manager duties of Debtors (.3).	0.50	\$625.00	\$312.50
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**Quantity Subtotal** **13.6**

Time Keeper	Quantity	Rate	Total
Kyung Lee	1.0	\$850.00	\$850.00
R. J. Shannon	11.4	\$625.00	\$7,125.00
Adam Rodriguez	1.2	\$250.00	\$300.00

**Quantity Total** **13.6**

**Subtotal** **\$8,275.00**

**Total** **\$8,275.00**



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# INVOICE

PLR Internal Reference # 534

Date: 06/06/2022

InfoWars, LLC

**Employment and Fee Applications**

Date	Attorney	Description	Quantity	Rate	Total
04/21/2022	AR	Draft Application to Employ, Declaration of R. Shannon and Proposed Order thereto.	3.20	\$250.00	\$800.00
05/05/2022	AR	Continue working on draft Application to Employ PLR (3.3); send same to in house team for comments (.1).	3.40	\$250.00	\$850.00
05/06/2022	AR	Revise Motion to Withdraw PLR (.4); Draft PLR Fee Application (6.4)	6.80	\$250.00	\$1,700.00
05/11/2022	AR	Continue working on Draft PLR Fee App for March through May 2022	4.60	\$250.00	\$1,150.00
05/12/2022	AR	Continue drafting and revising PLR fee app	2.90	\$250.00	\$725.00
05/13/2022	AR	Review and revise Schedule I to Lee Affidavit (.1); review redline of Lee affidavit (.4)	0.60	\$250.00	\$150.00
05/13/2022	RJS	Attention and respond to C. Rubio emails re fee application (.1); review fee application (.5); office conference with M. Schwartz re same (.4); conference with with L. Parkins and C. Rubio re same (.2); revise application to employ based on conferences (1.0); draft email to M. Schwartz re signature and approval to file (.1); direct filing and service of same (.2).	2.50	\$625.00	\$1,562.50
05/16/2022	BM	Mailing of Application to Employ	0.80	\$180.00	\$144.00

**Quantity Subtotal 24.8**

<b>Time Keeper</b>	<b>Quantity</b>	<b>Rate</b>	<b>Total</b>
R. J. Shannon	2.5	\$625.00	\$1,562.50
Britnie McFadden	0.8	\$180.00	\$144.00
Adam Rodriguez	21.5	\$250.00	\$5,375.00

**Quantity Total 24.8**

**Subtotal \$7,081.50**

**Total \$7,081.50**



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# INVOICE

PLR Internal Reference # 535  
Date: 06/06/2022

InfoWars, LLC

## Litigation

Date	Attorney	Description	Quantity	Rate	Total
04/18/2022	BM	Draft and format Original Complaint and Order re 105(a) injunction, multiple revisions as needed per K. Lee.	5.00	\$180.00	\$900.00
04/18/2022	RJS	Prepare notices of removal for filing (1.5); direct and supervise filing of notices of removal (.5); various emails re same (.3); attention to issue re nonsuit of Heslin and Lewis matter (.5); call with clerk of court for W.D. of Texas re improperly referenced removed TUFTA litigation (.2); research issues re nonsuit and whether IW still party in light of sanctions pending (2.1); serve notices of removal on parties in interest (.5); draft notices for state courts and suggestions of bankruptcy for filing in state court (2.9); draft email to state court counsel re same (.2); call with state court counsel re same (.1).	7.80	\$625.00	\$4,875.00
04/19/2022	BM	Review and edit redlined complaint from K. Lee regarding 105(a) injunction.	1.50	\$180.00	\$270.00
04/19/2022	RJS	Various emails re Heslin and Lewis litigation and hearing in state court on 4/20/22 (.5); call with A. Reynal re same (.2); draft detailed memo on jurisdiction of state court on removed matter and bankruptcy court jurisdiction for A. Reynal's use in hearing in state court (6.0); prepare various exhibits re same (.5).	7.20	\$625.00	\$4,500.00
04/20/2022	AR	Review and revise Witness and Exhibit List	2.90	\$250.00	\$725.00

04/20/2022	RJS	Prepare for (.5) and attend (2.5) hearing in Travis County District Court re Heslin matter; emails with K. Lee, S. Jordan, and R. Battaglia re joinder to notice of removal (.4); call with S. Jordan re hearing in Heslin matter (.3); begin drafting response to forthcoming motion to remand (6.7).	10.40	\$625.00	\$6,500.00
04/20/2022	RJS	Attention to various emails re preparation for 4/22/20 hearing in bankruptcy court (3); review witness and exhibit list re same (.1); review notice prepared by A. Rodriguez re same (.1); analyze witness preparation for M. Schwartz re same (.1).	0.60	\$625.00	\$375.00
04/20/2022	KSL	Begin outlining issues relating to First Day matters and two Emergency Motions relating to appointment of Trustees and CROs (2.0).	2.00	\$850.00	\$1,700.00
04/21/2022	AR	Prepare exhibit binders re First Day Hearing on 4-22-222 (.7).	0.70	\$250.00	\$175.00
04/21/2022	RJS	Call with Ray Battaglia re potential joinder to notice of removals (.1); prepare for hearing on 4/22/22 (3.1).	4.20	\$625.00	\$2,625.00
04/21/2022	AR	Preparation of notebooks of Witness and Exhibit Lists (including exhibits) for use in hearing on April 22, 2022 at 9:00 AM.	1.00	\$250.00	\$250.00
04/21/2022	KSL	Prepare Q&A for Marc Schwartz, CRO, in anticipation of hearings on First Day Hearings (1.0), analyze same and discuss with Schwartz and revise (1.0); emails with Texas and Connecticut counsel on issues raised by filing subchapter v for the three debtors (1.0); handle preparation for first day hearings (1.0)	4.00	\$850.00	\$3,400.00
04/22/2022	AR	Attend First Day Hearings.	2.80	\$250.00	\$700.00
04/22/2022	RJS	Prepare for (1.0) and attend (3.5) first-day hearing.	4.50	\$625.00	\$2,812.50
04/22/2022	KSL	Prepare for First Day Hearings on Infowars with Marc Schwartz, CRO, and work on reviewing, editing and refining Witness Q&A (1.0); handle Status Conference (2.0); review issues to handle with team after hearing and follow-up with client and affiliated parties (1.0)	4.00	\$850.00	\$3,400.00
04/23/2022	AR	Pull requested case law from "What Qualifies As "Engaged In Business Or Commercial Activities" For Subchapter V Eligibility?" article and send same to K Lee	1.20	\$250.00	\$300.00
04/23/2022	RJS	Attend video meeting re joinder of AEJ and FSS to removal of Heslin matter (.5); draft visiting attorney motion for	6.10	\$625.00	\$3,812.50

		Conn AP (1.0); draft response to motion for shortened notice in Conn AP (2.6); draft response to motion to remand (2.0).			
04/24/2022	AR	Review and edit Bench Memo regarding subchapter v.	0.90	\$250.00	\$225.00
04/24/2022	RJS	Draft email to A. Reynal re pro hac motion for W.D. Texas (.2); prepare form re same and file in W.D. of Texas Bankruptcy Court (1.5); draft response to motion to remand in Heslin matter (4.2); call with potential local counsel in Conn. (.5).	6.40	\$625.00	\$4,000.00
04/25/2022	AR	Review and edit Bench memorandum (2.8); file same (.2); service of same (1.3); Legal research regarding amending declaration/judicial estoppel(1.1).	5.40	\$250.00	\$1,350.00
04/25/2022	HN	Review and revise bench memorandum and confer with senior counsel regarding the same.	0.70	\$525.00	\$367.50
04/25/2022	RJS	Revise documents needed for pro hac admission in Conn. and send to C. Atkinson (.5); analyze issues re emergency setting of Motion to dismiss by Conn. Plaintiffs and draft email to K. Lee re same (1.0); continue drafting response to Heslin motion to remand (7.1).	8.60	\$625.00	\$5,375.00
04/25/2022	KSL	Continue to seek Connecticut counsel to work with relating to Remand and issues on Motion to Transfer Venue (.5); monitor emails and questions arising relating to case developments and position of the parties (1.0).	1.50	\$850.00	\$1,275.00
04/26/2022	RJS	Revise motion and affidavit re pro hac vice for District of Connecticut (.7); obtain notary for same (.1); draft email to C. Atkinson re same (.1); attention to K. Lee draft of InfoW preliminary response to emergency setting of Conn. Plaintiffs MTD and provide comments to same (1.9); continue drafting of response to Heslin motion for remand including detailed analysis of relevant exhibits with relevant exhibits and circulate to K. Lee and M. Schwartz for comment (8.2).	11.00	\$625.00	\$6,875.00
04/26/2022	AR	Attend Zoom meeting regarding local Counsel in Connecticut.	0.40	\$250.00	\$100.00
04/26/2022	AR	Draft and edit Motions for Pro Hac Vice for K. Lee for Connecticut adversary proceedings.	0.30	\$250.00	\$75.00
04/26/2022	KSL	Follow-up in search of Connecticut bankruptcy counsel for hearings on remand and transfer of venue (1.0).	1.00	\$850.00	\$850.00

04/27/2022	AR	Review and edit Preliminary Response to Conn. Mtn to Dismiss.	0.90	\$250.00	\$225.00
04/27/2022	RJS	Research re preliminary response to motion to dismiss (1.3); revise same (.9); draft email to K. Lee and A. Rodriguez re same (.1).	2.30	\$625.00	\$1,437.50
04/27/2022	RJS	Revise response motion for remand in Heslin and Lewis matters in light of additional motion to dismiss by such plaintiffs (.7); proof and edit same (1.0); update and revise motion to transfer venue of Texas adversary proceedings (4.9).	6.70	\$625.00	\$4,187.50
04/28/2022	AR	Review April 22, 2022 hearing transcript(1.3); Review and file Response to Motion for Abstention and Remand (Heslin Adv.), and Motion to Transfer Venue (Heslin, Pozner, and Fontaine Advs.) and service of same(1.2);Retrieve recently filed documents in the the chapter 11 and removal cases and upload into firm litigation database; code and tag same(2.4).	4.90	\$250.00	\$1,225.00
04/28/2022	RJS	Finalize response to Heslin motion to remand and motion to transfer venue of Texas APs (1.0); Direct A. Rodriguez to file and serve same in W.D. of Texas Bankruptcy Court (.2); prepare for hearing on 4/29/2022 (2.5).	3.70	\$625.00	\$2,312.50
04/29/2022	KSL	Prepare witnesses for Status Conference with Judge Lopez on status of cases (2.0); analyze latest developments on Motions to Dismiss and positions of US Trustee, Conn and Texas Plaintiffs (1.0); handle Status Conference with Judge Lopez (1.0)	4.00	\$850.00	\$3,400.00
05/01/2022	AR	Web based research regarding Judge Lopez opinions; pull cases cited in MTD; creation of online, cloud based doc repository	4.50	\$250.00	\$1,125.00
05/01/2022	RJS	Respond to K. Lee email re Schwartz declaration (.1); attention to emails from K. Lee and S. Jordan re restructuring related to MTDs (.1); draft detailed response re same (.6); draft email to M. Schwartz and H. Lee re 2007 IP assignments from AEJ to Debtors and gather related documents (.5).	1.30	\$625.00	\$812.50
05/02/2022	AR	Review Connecticut State Court litigation dockets and pull Protective Order and Order Granting Motion to Modify same.	1.30	\$250.00	\$325.00
05/02/2022	AR	Preparation of notebooks containing case law from Motions to Dismiss from TX Plaintiffs, CT Plaintiff's and US	6.60	\$250.00	\$1,650.00



Trustee					
05/02/2022	RJS	Continue drafting response to motion to remand Connecticut litigation (.2); attention to notice of dismissal filed in Conn cases (.3); call with C. Atkinson re same (.2); analyze relevant caselaw (.9); call with K. Lee re same (.1); discuss same with CRO and K. Lee (.2).	5.90	\$625.00	\$3,687.50
05/02/2022	RJS	Outline proposal and draft email re distinguishing case with other cases re motion to dismiss.	0.70	\$625.00	\$437.50
05/02/2022	BM	Assist in preparation of notebook of caselaw re motion to dismiss.	1.00	\$180.00	\$180.00
05/02/2022	KSL	Analyze status of negotiations among the parties on withdrawals of claims and determine why the claims are not being withdrawn without prejudice and what it means to the Debtors' estates and discuss same with Marc Schwartz (1.0)	1.00	\$850.00	\$850.00
05/03/2022	RJS	Zoom meeting with K. Lee, M. Schwartz, and M. Ridulfo re Conn litigation.	0.30	\$625.00	\$187.50
05/03/2022	KSL	Analyze issues relating to Remand and Connecticut counsel (1.0); follow-up with M.Schwartz and handle issues raised by CRO (.5).	1.50	\$850.00	\$1,275.00
05/04/2022	AR	Attend Zoom meeting with litigation team (.8); email notices of dismissals and nonsuits to K Lee (.1); Draft App to Employ PLR (2.1); Draft Motion to Withdraw PLR (.4).	3.50	\$250.00	\$875.00
05/05/2022	AR	Draft 2019 Disclosures	0.70	\$250.00	\$0.00
05/05/2022	KSL	Continue to work on issues relating to withdrawal of claims by Connecticut and Texas Plaintiffs and handle logistics relating to same (1.0); handle updates necessary in light of developments with Plaintiffs and US Trustee negotiations (1.0)	2.00	\$850.00	\$1,700.00
05/06/2022	RJS	Respond to M. Schwartz and K. Lee emails re effects of voluntary dismissals.	0.30	\$625.00	\$187.50
05/06/2022	KSL	Monitor status of developments on memorializing dismissals sought by Texas and Connecticut Plaintiffs (.4); analyze issues requiring attention in Connecticut bankruptcy court on remand (.5); emails with Marc Schwartz on status of case (.1)	1.00	\$850.00	\$850.00
05/09/2022	AR	Retrieve recently filed documents in the the chapter 11, state and removal cases and upload into firm litigation	4.50	\$250.00	\$1,125.00

		database; code and tag same.			
05/09/2022	RJS	Attention to email from J. Ruff re case (.1); draft response to same (.7); gather various documents from adversary proceedings to support response (.7).	1.50	\$625.00	\$937.50
05/09/2022	RJS	Analyze MTDs filed by Conn. Plaintiffs, Texas Plaintiffs, and UST (1.5); outline response and conduct related research (2.0); begin drafting response (2.2).	5.70	\$625.00	\$3,562.50
05/09/2022	KSL	Review SOFA draft, answer remaining questions on SOFA issues, review status of withdrawals and necessity for Stipulations in telephone calls with Max Beatty and office conferences with RJ Shannon and follow-up with Marc Schwartz (1.0)	1.00	\$850.00	\$850.00
05/10/2022	RJS	Analyze requests for status conference (.8); office conference with K. Lee with M. Beatty on phone re potential to resolve through stipulation (.1); prepare draft stipulation resolving disputes with Texas Plaintiffs, Texas Plaintiffs MTD, remand motions in W.D. of Texas, & motion to transfer venue (5.0); draft email to K. Lee and Marc Schwartz re same (.1).	6.00	\$625.00	\$3,750.00
05/10/2022	AR	Retrieve recently filed documents in the the chapter 11, state and removal cases and upload into firm litigation database; code and tag same.	4.20	\$250.00	\$1,050.00
05/10/2022	KSL	Monitor emails and discuss issues relating to implementing dismissals with prejudice from the Texas and Connecticut Plaintiffs, handle administrative issues relating to filing Schedules and SOFAs and reviewing deadlines in connection with remainder of creditors to handle (1.0)	1.00	\$850.00	\$850.00
05/11/2022	AR	Attend Zoom conference with litigation team.	0.90	\$250.00	\$225.00
05/11/2022	AR	Review and edit Stipulation with TX Plaintiffs	0.10	\$250.00	\$25.00
05/11/2022	KSL	Handle calls relating to status of Connecticut counsel for Debtors in connection with Remand Hearings (.5); follow-up on issues relating to whether the Texas and Conn. Plaintiffs will agree to dismiss with prejudice and draft Stipulations drafted by RJ Shannon (1.5); handle other administrative issues with Marc Schwartz on balance of case matters (1.0)	3.00	\$850.00	\$2,550.00
05/11/2022	RJS	Draft email to S. Jordan responding to issues with potential stipulations (.2); draft email to M. Schwartz re potential next steps with case and outlining paths forward for Debtors	10.00	\$625.00	\$6,250.00

(.3); attend video conference re stipulations with plaintiffs with K. Lee, M. Schwartz, S. Jordan and Debtors' position wrt case (.7); update draft stipulation for Texas plaintiffs re same (.4); draft email to M. Beatty re same (.2); draft stipulation for Connecticut plaintiffs (1.1); draft email to R. Chapple and R. Wheeler re same (.2); email to K. Lee re deadline in Connecticut re remand motion (.1); finalize responses to motion for remand in light of no response from Conn Plaintiffs (6.8).

05/12/2022	AR	Draft exhibit list regarding 5-13-2022 Status Conference	1.20	\$250.00	\$300.00
05/12/2022	KSL	Numerous emails and t/cs with Max Beatty and RJ Shannon to discuss status of edits and comments to the Stipulations of Dismissals with Prejudice of Texas and Connecticut Plaintiffs suits (1.0); follow-up with M. Hasselden to update on status of case (.3); update M. Okin and proposed trustees of case (.4); begin reviewing notes for Status Conference with Marc Schwartz (.3); edit and revise draft Application to Retain and Terminate PLR as bankruptcy counsel (1.0)	3.00	\$850.00	\$2,550.00
05/12/2022	RJS	Attention to email from C. Atkinson re filing of response to motion to remand and draft email to M. Schwartz re additional language (.1); follow up emails re filing of same (.1); Video conference meeting with counsel for Texas and Connecticut Plaintiffs re stipulations (.5); gather exhibits for w/e list for 5/12/22 hearing (2.0); revise w/e list and finalize same for filing (.4); draft email re same to M. Beatty (.1); prepare for status conference re update to judge of negotiations with Plaintiffs status of removed litigation (1.0); call with M. Beatty re Texas Plaintiffs' position (.1).	4.20	\$625.00	\$2,625.00
05/13/2022	KSL	Prepare for Status Conference with Marc Schwartz and RJ Shannon relating to latest developments in case (1.0); attend Status Conference and provide update to Judge Lopez on same (.5); follow-up with counsel and Plaintiffs as to dismissals with prejudice and no claims against debtors debate (1.0)	2.50	\$850.00	\$2,125.00
05/13/2022	RJS	Review draft notice of dismissal from A. Sterling for Connecticut plaintiffs (.2); attention to comments from C. Atkinson re Connecticut local procedure (.1); draft emails to M. Schwartz and K. Lee re same (.2); in person conference with M. Schwartz and K. Lee re same (.1); draft responsive emails to A. Sterling re same (.1); prepare for (.5) and attend (.5) status conference with Bankruptcy Court; call with M. Beatty after hearing re stipulations (.1); attention to draft stipulation from M. Beatty and forward	1.90	\$625.00	\$1,187.50

		same to K. Lee and M. Schwartz (.1).			
05/14/2022	KSL	Numerous emails with H. Magiliff, potential Connecticut counsel for the Debtors (.5); review emails from RJ Shannon with counsel for Conn and Texas Plaintiffs on remand issues (.5)	1.00	\$850.00	\$850.00
05/14/2022	RJS	Confirm CRO and K. Lee approval of stipulations (.2); draft email to M. Beatty and A. Moshenberg re same (.2); conference with K. Lee re matter (.1).	0.50	\$625.00	\$312.50
05/16/2022	RJS	Prepare motion to expedite for Texas Plaintiffs.	1.30	\$625.00	\$812.50
<b>Quantity Subtotal</b>					<b>209.7</b>
<b>Line Item Discount Subtotal</b>					<b>-\$175.00</b>

<b>Time Keeper</b>	<b>Quantity</b>	<b>Rate</b>	<b>Discount</b>	<b>Total</b>
Kyung Lee	33.5	\$850.00	-	\$28,475.00
Hale Neilson	0.7	\$525.00	-	\$367.50
R. J. Shannon	119.1	\$625.00	-	\$74,437.50
Britnie McFadden	7.5	\$180.00	-	\$1,350.00
Adam Rodriguez	48.9	\$250.00	-\$175.00	\$12,050.00
<b>Quantity Total</b>				<b>209.7</b>
<b>Subtotal</b>				<b>\$116,680.00</b>
<b>Total</b>				<b>\$116,680.00</b>



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# INVOICE

PLR Internal Reference # 536

Date: 06/06/2022

InfoWars, LLC

**Plan and Disclosure Statement**

Date	Attorney	Description	Quantity	Rate	Total
04/26/2022	KSL	Revise and edit Plan of Reorganization (1.0); revise and edit Plan Support Agreement (1.0).	2.00	\$850.00	\$1,700.00
04/28/2022	AR	Review comments to proposed final PSA.	1.90	\$250.00	\$475.00
<b>Quantity Subtotal</b>					<b>3.9</b>

Time Keeper	Quantity	Rate	Total
Kyung Lee	2.0	\$850.00	\$1,700.00
Adam Rodriguez	1.9	\$250.00	\$475.00
<b>Quantity Total</b>			<b>3.9</b>
<b>Subtotal</b>			<b>\$2,175.00</b>
<b>Total</b>			<b>\$2,175.00</b>



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# INVOICE

PLR Internal Reference # 568

Date: 06/13/2022

InfoWars, LLC

**Non-Working Travel**

Date	Attorney	Description	Quantity	Rate	Total
04/19/2022	RJS	Non-Working travel from Houston to Austin for 4/20/22 hearing in Heslin matter.	2.60	\$312.50	\$812.50
Quantity Subtotal					2.6
Time Keeper		Quantity	Rate	Total	
R. J. Shannon		2.6	\$312.50	\$812.50	
Quantity Total					2.6
Subtotal					\$812.50
Total					\$812.50



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# INVOICE

PLR Internal Reference # 567

Date: 06/13/2022

InfoWars, LLC

**InfoW: Expenses**

Type	Attorney	Date	Description	Total
Expense	AR	04/28/2022	Veritext transcript from first day hearing on 4-22-2022.	\$67.50

Time Keeper	Quantity	Rate	Total
		<b>Subtotal</b>	<b>\$67.50</b>
		<b>Total</b>	<b>\$67.50</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

<b>In re:</b>  <b>INFOW, LLC, <i>et al.</i>,</b>  <b>Debtors.<sup>1</sup></b>	) ) ) ) ) )	<b>Case No. 22-60020</b>  <b>Chapter 11 (Subchapter V)</b>  <b>Jointly Administered</b>
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**ORDER APPROVING FIRST AND FINAL APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PARKINS &  
RUBIO, LLP, AS GENERAL COUNSEL FOR THE DEBTORS, FOR THE PERIOD  
APRIL 18, 2022 THROUGH MAY 15, 2022**

The Court considered the First and Final Application (the “Application”) for Allowance of Compensation and Reimbursement of Expenses of Parkins & Rubio, LLP, as General Counsel for the Debtors, for the Period April 18, 2022 Through May 15, 2022 (the “Application Period”). The Court, having considered the Application, evidence, arguments of counsel, and objections, if any; and based on the matters reflected in the record of the hearing held on the Application; it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334; that this is a core proceeding pursuant to 28 U.S.C. § 157(b); that notice of the Application was sufficient; and that good cause has been shown for the award of fees and expenses during the Application Period; finds that the Application should be **GRANTED**.

Therefore, it is hereby **ORDERED** that:

1. The Application seeking compensation of \$162,745.00 in fees and reimbursable expenses incurred between April 18, 2022 through May 15, 2022 is approved on a final basis.

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<sup>1</sup> The Debtors in these chapter 11 cases along with the last four digits of each Debtor’s federal tax identification number are as follows: InfoW, LLC, f/k/a Infowars, LLC (6916), IWHealth, LLC f/k/a Infowars Health, LLC (no EIN), Prison Planet TV, LLC (0005). The address for service to the Debtors is PO Box 1819, Houston, TX 77251-1819.



2. Parkins & Rubio, LLP is authorized and directed to draw down from the retainer to pay the outstanding fees and expenses incurred during the Application Period.

3. After drawing down the retainer to pay outstanding fees and expenses approved in this Order, the Debtors are authorized and directed to pay Parkins & Rubio, LLP all remaining fees and expenses incurred by Parkins & Rubio, LLP during the Application Period.

4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

DATED: \_\_\_\_\_, 2022

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CHRISTOPHER LOPEZ  
UNITED STATES BANKRUPTCY JUDGE